

**Response to Comments
March 19, 2003**

Comment: The Workplan does not clearly identify the responsible parties who will be responsible for conducting the work.

Response: The Administrative and Public Process document states on page 7 that the responsible parties for conducting the work will be the agencies and/or individuals that are outlined in the Memorandum of Understanding with the Los Angeles Regional Water Quality Control Board. It has been our intent to develop a MOU between the RWQCB and the parties once the Board accepted our approach. We do not believe there is adequate time to develop that agreement in the 90-day window. We do however have a draft prepared and we are anxious to begin working out the details.

Comment: The Workplan does not clearly describe the interface between the Standards Review tasks and determination that TMDLs may or may not be necessary.

Response: The schedule for the work plan tasks outlines the timeline for completing all of the work. Throughout the process, the results of the work will be assessed to determine the need to develop TMDLs. All of the work being done under this work plan will provide information necessary for completing a scientifically sound TMDL. If determined to be necessary, TMDL development will be initiated in sufficient time to meet the requirements of the stay agreement.

Comment: The Workplan does not adequately address chloride issues associated with agricultural supply for salt sensitive crops.

Response: The work plan includes three tasks to specifically address chloride issues for agricultural supply and several others that include an agricultural component. Tasks UA-2 and UA-3 include an assessment of the locations of chloride sensitive crops, the water supplies currently being used on the crops, the availability of alternative supplies, and an assessment of groundwater impacts from salts. Tasks UA-7 and WQS-7 are designed to assess the impacts on beneficial uses, including agriculture and identify appropriate water quality standards to protect beneficial uses, including agriculture. Task EA-6 is the identification of options for supplying sensitive crops with the necessary water quality.

Comment: The Workplan does not provide an approach to address Porter Cologne requirements for water quality standards work affecting agriculture programs, i.e. cost benefit analysis.

Response: The development of any water quality standards will comply with all legal requirements, including the Porter Cologne requirements. Work conducted under the work plans will support the development of information, as necessary, to facilitate the development and approval of any Basin Plan amendments that come out of the analysis (see page 19 of the Salts Work Plan).

Comment: The Workplan does not address concerns with the Ocean outfall capacity.

Response: Concerns regarding the Ocean outfall are premature. Calleguas MWD is preparing to apply for a permit at the Reliant Energy location. They will address the particulars regarding capacity and quality through that process. If you expect to wait for this to be completed we will not finish the salts plan in time.

Comment: The Workplan does not address development of monitoring programs required to assess TMDL progress.

Response: The TMDL tasks include the development of an implementation plan. As part of this plan, any required monitoring programs will be developed.

Comment: The Workplan does not provide tasks to measure and assess chloride load reductions from early actions.

Response: Task EA-7 is an assessment of the effectiveness of the early action items in achieving water quality standards. Through this work, we will be able to assess chloride load reductions. The assessment will include modeling or monitoring as necessary to complete the evaluation.

Comment: The Workplan does not provide an approach for evaluating feasibility of interim discharge below Potrero Road.

Response: This assessment will be conducted as part of the CEQA process and the NPDES permitting process. It is our intent to move forward with the CEQA process very soon.

Additional Comments on Other Calleguas TMDL Workplans

Comment: There appears to be an imbalance between standards review work and TMDL development work in terms of resources and funding.

Response: All of the standards review work gathers useful information that feeds into the development of a scientifically sound TMDL, when necessary. The resources allocated to TMDL development are felt to be adequate based on the experience of the watershed group in developing the Nutrient TMDL.

Comment: The Workplans need to provide a framework for selecting models to be used in the linkage analyses.

Response: The TMDL Tools outline discusses the information necessary for selecting models to be used for the work plan tasks, including the linkage analysis. The existing models in the

watershed will first be assessed for use. If the existing models can not be used or adapted to provide the information necessary for completing the work plan tasks and linkage analysis, an appropriate model(s) will be selected and developed to complete the work.

Comment: The Workplans need to provide a task to develop a QAPP.

Response: As discussed on page 14 of the Administrative and Public Process document, a QAPP was developed for the Calleguas Creek Characterization Study. This document will be updated as necessary to address the work in the work plans.

Comment: The Workplans need to discuss the contractor selection process.

Response: The consent decree does not allow us the luxury of a lengthy RFP and selection process. The position of the responsible parties is that consultant must be qualified and able to perform within the required time schedule. If the selected consultants do not meet that criteria we should discuss the basis of your concern. To satisfy the concerns of those who may feel at some disadvantage in reviewing Workplan technical products produced by consultants or need some technical assistance in understanding and participating in the technical aspects of the Workplan process, we are considering securing funding to hire technical advisors that are acceptable to third party stakeholders participating in the process.